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2 **UNITED STATES DISTRICT COURT**
3 **NORTHERN DISTRICT OF CALIFORNIA**
4 **SAN FRANCISCO DIVISION**

5
6 IN RE: UBER TECHNOLOGIES, INC.,
7 PASSENGER SEXUAL ASSAULT
8 LITIGATION

Case No. 3:23-md-03084-CRB

9
10 **[PROPOSED AMENDED] ORDER**
11 **REGARDING MOTION TO DISMISS CASES**
12 **FOR FAILURE TO COMPLY WITH PTO 31**
13 **AND SHOW-CAUSE ORDERS**

14
15 This Document Relates to:

16 *See Exhibits to Order*
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[PROPOSED AMENDED] ORDER

Having considered Defendants' Motion to Dismiss Cases for Failure to Comply with PTO 31 and Show-Cause Orders, the Court finds that:

1. The Plaintiffs subject to this Court's September 9 and September 22, 2025 orders to show cause have failed to show cause why their cases should not be dismissed with prejudice for their submission of fraudulent receipts in support of their claims. The Court orders that their cases, listed in Exhibit A, are DISMISSED WITH PREJUDICE.

2. The law firms of Nachawati Law Group; Slater Schulman LLP; Levin Simes LLP; Chaffin Luhana; Cutter Law PC; Walkup, Melodia, Kelly & Schoenberger; Pulaski Law Firm; Simmons Hanly Conroy; Peiffer Wolf; and Kherkher Garcia represent one or more of the 27 plaintiffs who submitted fraudulent receipts. For each ride receipt already submitted by clients of these law firms in the MDL, the firms are required to submit within 30 days a Fed. R. Civ. P. 26(g) certification that they have completed a full review and analysis of each receipt with each of their clients before the receipts were submitted, using the certification attached as Exhibit B. For each receipt submitted in the future by clients of these law firms in the MDL, the firms are required to submit the certification attached as Exhibit B contemporaneously with the receipt certifying under Rule 26(g) that they have completed a full review and analysis of each receipt with their clients before the receipts were submitted. For each receipt already submitted by clients of these law firms in the MDL, each plaintiff is required to submit within 30 days a certification stating under oath that they have completed a full review and analysis of each receipt with their counsel before the receipts were submitted, using the certification attached as Exhibit C. For each receipt submitted in the future by clients of these law firms in the MDL, each plaintiff is required to submit the certification attached as Exhibit C

1 contemporaneously with the receipt, stating under oath that they have completed a full review and
2 analysis of each receipt with their counsel before the receipts were submitted.

3 3. Multiple Plaintiffs subject to Pretrial Order No. 31 have violated it by failing to produce
4 a bona fide ride receipt or a statement explaining in detail the reasonable efforts they have undertaken
5 to search for the receipt and explaining why they have been unable to locate it. Plaintiffs' non-
6 compliance has substantially prejudiced Uber. Pursuant to Pretrial Order No. 31, the Court orders that
7 their cases, listed in Exhibit D, are DISMISSED WITHOUT PREJUDICE.
8

9 [Defendants defer to the Court to insert whatever relief and other language the Court deems necessary
10 to address these Plaintiffs' fraud and non-compliance with Court orders, and to deter future fraud and
11 noncompliance with this Court's orders.]
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13 **IT IS SO ORDERED.**
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16 Dated: _____, 202__

HON. CHARLES R. BREYER
United States District Court Judge

EXHIBIT A

<u>MDLC ID</u>	<u>Case Number</u>
1194	3:23-cv-05930
1199	3:23-cv-05944
1384	3:24-cv-03441
1507	3:24-cv-04363
1914	3:24-cv-05717
2103	3:24-cv-05740
2350	3:24-cv-05864
2642	3:24-cv-07491
2723	3:24-cv-08622
2734	3:24-cv-09050
2812	3:25-cv-00369
2918	3:25-cv-01079
2959	3:25-cv-01384
3038	3:25-cv-01999
3047	3:25-cv-02109
3048	3:25-cv-02111
3078	3:25-cv-02401
3125	3:25-cv-02678
3198	3:25-cv-02931
3286	3:25-cv-03260
3303	3:25-cv-03547
3422	3:25-cv-04414
3425	3:25-cv-04466
3510	3:25-cv-04802
3521	3:25-cv-04878
3659	3:25-cv-05474
3841	3:25-cv-06705

EXHIBIT B

Attorney Certification of Review for Plaintiff's Receipt

I declare as follows based upon personal knowledge, including by and through investigation:

[EITHER]

Prior to submitting a ride receipt on behalf of Plaintiff _____ in this MDL on [date], I completed a full review and analysis of the ride receipt with that Plaintiff.

[OR]

Prior to submitting a ride receipt on behalf of Plaintiff _____ in this MDL on [date], I did not complete a full review and analysis of the ride receipt with that Plaintiff.

Date: _____

[Signature of Counsel of Record & Signature Block]

EXHIBIT C

Plaintiff Certification of Review for Ride Receipt

I declare as follows under penalty of perjury:

[EITHER]

Prior to my counsel submitting a ride receipt on my behalf in this MDL on [date], my counsel and I completed a full review and analysis of the ride receipt.

[OR]

Prior to my counsel submitting a ride receipt on my behalf in this MDL on [date], my counsel and I did not complete a full review and analysis of the ride receipt.

Date: _____

[Signature of Plaintiff]

EXHIBIT D

MDLC ID	Case Number	Plaintiff Pseudonym	Plaintiff Firm
1121	3:23-cv-03811	Jane Doe LS 134	Levin Simes, LLP
1154	3:23-cv-05237	Jane Doe LS 364	Levin Simes, LLP
1184	3:23-cv-05433	Jane Doe LS 234	Levin Simes, LLP
1187	3:23-cv-05572	Jane Doe LS 322	Levin Simes, LLP
1189	3:23-cv-05573	Jane Doe LS 191	Levin Simes, LLP
1195	3:23-cv-05922	Jane Doe LS 185	Levin Simes, LLP
1362	3:24-cv-00574	J.R.	Nachawati Law Group
1490	3:24-cv-04322	Jane Doe (D.H.)	Nachawati Law Group
1493	3:24-cv-04330	Jane Doe (Y.E.)	Nachawati Law Group
1504	3:24-cv-04360	Jane Doe (S.W.)	Nachawati Law Group
1511	3:24-cv-04370	Jane Doe (E.N.)	Nachawati Law Group
1776	3:24-cv-04680	CL 14	Cutter Law PC
1883	3:24-cv-05272	WHB 644	Williams Hart & Boundas, LLP
1925	3:24-cv-05361	WHB 703	Williams Hart & Boundas, LLP
1948	3:24-cv-05468	WHB 1661	Williams Hart & Boundas, LLP
1963	3:24-cv-05555	WHB 1930	Williams Hart & Boundas, LLP
1977	3:24-cv-05440	WHB 470	Williams Hart & Boundas, LLP
1988	3:24-cv-05495	WHB 1414	Williams Hart & Boundas, LLP
1989	3:24-cv-05500	WHB 1468	Williams Hart & Boundas, LLP
2066	3:24-cv-05779	WHB 1484	Williams Hart & Boundas, LLP
2067	3:24-cv-05781	WHB 375	Williams Hart & Boundas, LLP
2070	3:24-cv-05565	WHB 1659	Williams Hart & Boundas, LLP
2095	3:24-cv-05720	Jane Roe CL 36	Cutter Law PC

MDLC ID	Case Number	Plaintiff Pseudonym	Plaintiff Firm
2100	3:24-cv-05734	Jane Roe CL 40	Cutter Law PC
2104	3:24-cv-05741	Jane Roe CL 43	Cutter Law PC
2106	3:24-cv-05746	Jane Roe CL 45	Cutter Law PC
2110	3:24-cv-05810	CL 48	Cutter Law PC
2111	3:24-cv-05811	CL 49	Cutter Law PC
2115	3:24-cv-05831	CL 53	Cutter Law PC
2120	3:24-cv-05846	CL 58	Cutter Law PC
2127	3:24-cv-05950	WHB 1273	Williams Hart & Boundas, LLP
2133	3:24-cv-05603	WHB 1381	Williams Hart & Boundas, LLP
2148	3:24-cv-05631	WHB 438	Williams Hart & Boundas, LLP
2152	3:24-cv-05636	WHB 349	Williams Hart & Boundas, LLP
2165	3:24-cv-05624	WHB 1334	Williams Hart & Boundas, LLP
2174	3:24-cv-05669	WHB 1348	Williams Hart & Boundas, LLP
2176	3:24-cv-05665	WHB 1611	Williams Hart & Boundas, LLP
2178	3:24-cv-05666	WHB 891	Williams Hart & Boundas, LLP
2180	3:24-cv-05986	WHB 1556	Williams Hart & Boundas, LLP
2189	3:24-cv-05715	WHB 1057	Williams Hart & Boundas, LLP
2190	3:24-cv-05716	WHB 1470	Williams Hart & Boundas, LLP
2200	3:24-cv-05822	Jones, Cody	Pro se
2207	3:24-cv-05948	WHB 884	Williams Hart & Boundas, LLP
2223	3:24-cv-05115	L.B.	Nachawati Law Group
2231	3:24-cv-05340	C.H.	Nachawati Law Group
2233	3:24-cv-05343	J.J.	Nachawati Law Group
2236	3:24-cv-05718	Jane Doe (C.M.)	Nachawati Law Group

MDLC ID	Case Number	Plaintiff Pseudonym	Plaintiff Firm
2253	3:24-cv-05764	T.M.	Nachawati Law Group
2255	3:24-cv-05796	K.M.	Nachawati Law Group
2256	3:24-cv-05946	E.P.	Nachawati Law Group
2264	3:24-cv-06076	S.S.	Nachawati Law Group
2279	3:24-cv-05980	LS 303	Levin Simes, LLP
2302	3:24-cv-05316	LS 6	Levin Simes, LLP
2315	3:24-cv-05387	LS 54	Levin Simes, LLP
2322	3:24-cv-05836	LS 406	Levin Simes, LLP
2324	3:24-cv-05739	LS 420	Levin Simes, LLP
2367	3:24-cv-05853	LS 5	Levin Simes, LLP
2395	3:24-cv-05743	LS 430	Levin Simes, LLP
2398	3:24-cv-05327	LS 232	Levin Simes, LLP
2420	3:24-cv-05475	LS 136	Levin Simes, LLP
2425	3:24-cv-06021	LS 296	Levin Simes, LLP
2433	3:24-cv-06020	LS 291	Levin Simes, LLP
2440	3:24-cv-05928	LS 504	Levin Simes, LLP
2445	3:24-cv-05971	LS 135	Levin Simes, LLP
2450	3:24-cv-05862	LS 440	Levin Simes, LLP
2470	3:24-cv-05914	LS 304	Levin Simes, LLP
2471	3:24-cv-05909	LS 215	Levin Simes, LLP
2483	3:24-cv-05777	LS 214	Levin Simes, LLP
2489	3:24-cv-05982	LS 125	Levin Simes, LLP
2490	3:24-cv-05898	LS 368	Levin Simes, LLP
2499	3:24-cv-05885	LS 173	Levin Simes, LLP

MDLC ID	Case Number	Plaintiff Pseudonym	Plaintiff Firm
2509	3:24-cv-05419	LS 206	Levin Simes, LLP
2513	3:24-cv-05760	John Doe LS 3	Levin Simes, LLP
2599	3:24-cv-06863	CL 70	Cutter Law PC
2680	3:24-cv-07569	CL 76	Cutter Law PC
2682	3:24-cv-07584	Jane Roe CL 78	Cutter Law PC
2703	3:24-cv-08522	CL 82	Cutter Law PC
2705	3:24-cv-08526	CL 84	Cutter Law PC
2714	3:24-cv-08756	CL 86	Cutter Law PC
2756	3:24-cv-09211	LS 548	Levin Simes, LLP
2774	3:24-cv-09515	Jane Doe 693827	Kherkher Garcia
2788	3:25-cv-00007	C.L.	Pro se
2850	3:25-cv-01092	WHB 2060	Williams Hart & Boundas, LLP
2855	3:25-cv-01101	WHB 2064	Williams Hart & Boundas, LLP
2862	3:25-cv-01130	WHB 2071	Williams Hart & Boundas, LLP
2866	3:25-cv-01148	WHB 2075	Williams Hart & Boundas, LLP
2878	3:25-cv-01180	WHB 2036	Williams Hart & Boundas, LLP
2884	3:25-cv-01206	WHB 2042	Williams Hart & Boundas, LLP
2885	3:25-cv-01207	WHB 2043	Williams Hart & Boundas, LLP
2888	3:25-cv-01209	WHB 2044	Williams Hart & Boundas, LLP
2892	3:25-cv-01216	WHB 2048	Williams Hart & Boundas, LLP
2896	3:25-cv-01226	WHB 2051	Williams Hart & Boundas, LLP
2899	3:25-cv-01237	WHB 2053	Williams Hart & Boundas, LLP
2900	3:25-cv-01244	WHB 2054	Williams Hart & Boundas, LLP
2904	3:25-cv-01249	WHB 2057	Williams Hart & Boundas, LLP

MDLC ID	Case Number	Plaintiff Pseudonym	Plaintiff Firm
2906	3:25-cv-01255	WHB 2059	Williams Hart & Boundas, LLP
2952	3:25-cv-01349	Jane Roe CL 105	Cutter Law PC
2989	3:25-cv-01493	LS 553	Levin Simes, LLP
2990	3:25-cv-01693	LS 554	Levin Simes, LLP
3013	3:25-cv-01711	NLG (A.B.)	Nachawati Law Group
3014	3:25-cv-01714	NLG (M.G.)	Nachawati Law Group
3016	3:25-cv-01717	NLG (M.L.P.)	Nachawati Law Group
3118	3:25-cv-02551	C.O.	Peiffer Wolf Carr Kane Conway & Wise
3122	3:25-cv-02650	K.B.	Peiffer Wolf Carr Kane Conway & Wise
3151	3:25-cv-02616	Jane Doe NLG (KS)	Nachawati Law Group
3177	3:25-cv-02801	LS 583	Levin Simes, LLP
3178	3:25-cv-02792	LS 582	Levin Simes, LLP
3243	3:25-cv-03269	Jane Doe LS 593	Levin Simes, LLP
3258	3:25-cv-01943	CL 115	Cutter Law PC
3264	3:25-cv-02136	CL 121	Cutter Law PC
3266	3:25-cv-02139	CL 123	Cutter Law PC
3281	3:25-cv-03137	CL 138	Cutter Law PC
3298	3:25-cv-03364	J.M.	Pro se
3314	3:25-cv-02949	NLG (JH)	Nachawati Law Group
3373	3:25-cv-04041	JLG 134	Johnson Law Group
3380	3:25-cv-04071	LS 598	Levin Simes, LLP
3443	3:25-cv-03818	CL 153	Cutter Law PC
3473	3:25-cv-04582	Jane Doe 691174	Kherkher Garcia

MDLC ID	Case Number	Plaintiff Pseudonym	Plaintiff Firm
3512	3:25-cv-04699	LS 601	Levin Simes, LLP
3552	3:25-cv-04708	CL 172	Cutter Law PC
3648	3:25-cv-05318	Jane Doe 690917	Kherkher Garcia
3681	3:25-cv-05571	E.M. 3681	Cohen Hirsch, LP
3705	3:25-cv-05577	KG 013	Kherkher Garcia
3748	3:25-cv-05865	NLG (LL)	Nachawati Law Group
3758	3:25-cv-05942	LS 616	Levin Simes, LLP
3773	3:25-cv-06077	KG 039	Kherkher Garcia
3790	3:25-cv-06249	LS 620	Levin Simes, LLP
3791	3:25-cv-06243	LS 619	Levin Simes, LLP
3793	3:25-cv-06306	LS 622	Levin Simes, LLP
3798	3:25-cv-06382	I.C.	Peiffer Wolf Carr Kane Conway & Wise
3814	3:25-cv-06031	NLG (KF)	Nachawati Law Group
3828	3:25-cv-06541	LS 626	Levin Simes, LLP
3865	3:25-cv-06843	B.P.	Peiffer Wolf Carr Kane Conway & Wise